

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001 : 03 MDL 1570 (GBD)(SN)
: ECF Case

This document relates to:

Ashton, et al. v. al Qaeda Islamic Army, et al., Case No. 02-cv-6977 (GBD)(SN) (and member case *Hugh A. Chairnoff, et al. v. Islamic Republic of Iran*, Case No. 1:18-cv-12370 (GBD) (SN))

AFFIDAVIT OF JOSEPH PETER DRENNAN

CITY OF ALEXANDRIA : ss.:

COMMONWEALTH OF VIRGINIA :

BEFORE ME, the undersigned authority, Notary Public, in and for the Commonwealth of Virginia, did come and appear JOSEPH PETER DRENNAN, who did depose and say as follows, *viz.*:

1. That he is the principal of The Law Office of Joseph Peter Drennan, one of four law firms representing the Plaintiffs in the above-captioned case of *Hugh A. Chairnoff, et al. v. Islamic Republic of Iran*, Case No. 1:18-cv-12370 (GBD) (SN)) (hereinafter the “*Chairnoff* Action”);

2. That he was admitted *pro hac vice* in the *Chairnoff* Action on 5 February 2019 (*see*: MDL ECF No. 4397, *Chairnoff* ECF No. 27);

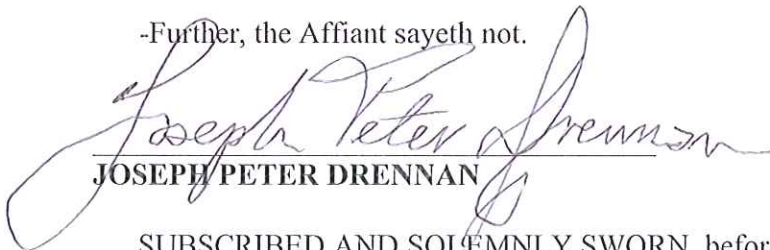
3. That he submits this Affidavit in support of the motion by Plaintiff Elizabeth Parks for an order pursuant to Rule 21 of the Federal Rules of Civil Procedure, dismissing her as a plaintiff in the *Chairnoff* Action;

4. That, in December of 2018, Elizabeth Parks retained his law firm and co-counsel P. York McLane to pursue civil claims arising out of the 11 September 2001 terrorist attacks on the United States (“9/11 Litigation”), and, on 31 December 2018, the *Chairnoff* Action was filed in this Honorable Court;

5. That, in the course of his due diligence prior to filing a motion for default judgment against the Islamic Republic of Iran in the *Chairnoff* Action (see: MDL ECF Nos. 6668-6671, *Chairnoff* ECF Nos. 49-52), he became aware that, on 6 September 2019, a 9/11-related judgment had been entered against Iran, awarding Elizabeth Parks solatium damages for the loss of her brother Robert Emmet Parks, Jr., and he has since confirmed that Elizabeth Parks is a plaintiff in the case of *Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.*, Case No. 1:15-cv-9903 (GBD)(SN), where she asserts the same claims against Iran that have been asserted on her behalf in the *Chairnoff* Action; and

6. That, accordingly, he respectfully requests that this Honorable Court enter an order dismissing Elizabeth Parks in the *Chairnoff* Action.

-Further, the Affiant sayeth not.


JOSEPH PETER DRENNAN

SUBSCRIBED AND SOLEMNLY SWORN, before Me, Nicole Regle, the undersigned authority, Notary Public in and for the Commonwealth of Virginia, on 1 September 2021.


Nicole Regle, Notary Public

City of Alexandria

My Commission expiry date is: 6/30/2025

My Virginia Notary Public Registration Number is: 7562048

